JDGE STEIN

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

INDICTMENT

ANTHONY YOUNG, a/k/a "Royalty,"

Defendant.

19 Cr. 256

SCURONICALLY FILED

COUNT ONE

Χ

(Sex Trafficking of Minor Victim-1)

The Grand Jury charges:

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August 2016, in the Southern District of New York and elsewhere, ANTHONY YOUNG, a/k/a "Royalty," the defendant, knowingly, in and affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited by any means a person, and did benefit, financially and by receiving anything of value, from participating in a venture which has engaged in any such act, and having had a reasonable opportunity to observe such person, knowing and in reckless disregard of the fact the person had attained the age of 14 years but had not attained the age of 18 years at the time ("Minor Victim-1"), and would be caused to engage in commercial sex acts, to wit, YOUNG recruited, enticed, harbored, transported,

provided, obtained, maintained, advertised, patronized, and solicited Minor Victim-1, a fifteen-year-old girl, who was then caused to engage in at least one commercial sex act.

(Title 18, United States Code, Sections 1591(a)(1), (b)(2) and 2.)

COUNT TWO

(Sex Trafficking of Minor Victim-2)

The Grand Jury further charges:

From at least on or about May 5, 2016 to at least on or 2. about May 31, 2016, in the Southern District of New York and YOUNG, a/k/a "Royalty," the elsewhere, ANTHONY knowingly, in and affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited by any means a person, and did benefit, financially and by receiving anything of value, from participating in a venture which has engaged in any such act, and having had a reasonable opportunity to observe such person, knowing and in reckless disregard of the fact the person had attained the age of 14 years but had not attained the age of 18 years at the time ("Minor Victim-2"), and would be caused to engage in commercial sex acts, to wit, YOUNG recruited, enticed, harbored, transported, provided, obtained, maintained, advertised, patronized, and solicited Minor Victim-2, a fifteen-year-old girl, who was then caused to engage in at least one commercial sex act.

(Title 18, United States Code, Sections 1591(a)(1), (b)(2) and 2.)

FORFEITURE ALLEGATION

3. As a result of committing the offenses alleged in Counts One and Two of this Indictment, ANTHONY YOUNG, a/k/a "Royalty," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594(d), any property, real and personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of the offenses alleged in Counts One and Two, and any property, real and personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of the offenses alleged in Counts One and Two, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses that the defendant personally obtained.

Substitute Assets Provision

- 4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third person;
 - c. has been placed beyond the jurisdiction of the Court;

- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981, and 1594; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)

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GEOFFREY S BERMAN

United States Attorney

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ANTHONY YOUNG, a/k/a "Royalty,"

Defendant.

INDICTMENT

19 Cr.

(18 U.S.C. §§ 1591(a)(1) and (b)(2) and 2.)

GEOFFREY S. BERMAN

United States Attorney

Foreperson

Indictment
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